

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

R’KES STARLING, individually and behalf of
all others similarly situated,

Plaintiff,

v.

PR ADVISORS, LLC, D/B/A PINNACLE
REALTY ADVISORS and RAM
PROPERTIES, LLC,

Defendants.

Case No. 1:24-cv-00991-RP

NOTICE OF PROPOSED JOINT SCHEDULING ORDER

Pursuant to the Court’s Order of March 7, 2025 (*see* Dkt. 33, “Order”), the Parties to the above-captioned matter respectfully and jointly submit the attached proposed scheduling order for the Court’s consideration. This submission is made jointly to comply with the Order, but is without prejudice to the Defendants’ pending “Motion for Protective Order to Temporarily Stay or Bifurcate Discovery” (*see* Dkt. 29), or the Parties’ respective positions relating thereto.

Dated: March 21, 2025

Respectfully submitted,

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com

Attorney for Plaintiff and the Proposed Class

By: /s/ A. Paul Heeringa (with permission)

JOHN W. MCGUINNESS

jmcguinness@manatt.com

(Admitted *Pro Hac Vice*)

A. PAUL HEERINGA

pheeringa@manatt.com

(Admitted *Pro Hac Vice*)

MANATT, PHELPS & PHILLIPS, LLP

1050 Connecticut Avenue, NW, Suite 600

Washington, D.C. 20036

Telephone: 202-585-6500

Facsimile: 202-585-6600

C. BRENTON KUGLER

Texas State Bar No. 11756250

brent.kugler@solidcounsel.com

SCHEEF & STONE, L.L.P.

500 North Akard, Suite 2700

Dallas, Texas 75201

(214) 706-4200 - Telephone

(214) 706-4242 – Facsimile

And

LEONCIO A. GIL, III

Texas State Bar No. 24094204

leon.gil@solidcounsel.com

SCHEEF & STONE, L.L.P.

2600 Network Blvd., Suite 400

Frisco, Texas 75034

(214) 472-2100 – Telephone

(214) 472-2150 – Facsimile

Counsel for Defendant PR Advisors, LLC

By: /s/ Yusuf A. Bajwa (with permission)

Yusuf A. Bajwa

Texas Bar No. 24047754

Lad Z. Stricker

Texas Bar No. 24110876

SANDERS BAJWA LLP

919 Congress Avenue, Suite 1305

Austin, Texas 78701

[Tel.] (512) 535-2440
ybajwa@sandersbajwa.com
lstricker@sandersbajwa.com
Attorneys for Defendant RAM Properties, LLC

CERTIFICATE OF SERVICE

I certify that on, March 20, 2025, a true and correct copy of the foregoing document was electronically filed with the Court's ECF system to be sent via the electronic notification system to all counsel of record in the above-captioned matter.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, Pennsylvania 19038
Phone: 215-225-5529 (CALL-LAW)
Facsimile: 888-329-0305
a@perronglaw.com

Attorney for Plaintiff and the Proposed Class